

TITLE V PERMIT STATEMENT

Facility Name: Tennessee Gas Pipeline Company L.L.C. (TGP) – Station 71
City: Middleton
County: Hardeman

Date Application Received: March 9, 2017
Date Application Deemed Complete: March 9, 2017

Emission Source Reference No.: 35-0006
Permit No.: 572606

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1.(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to *Tennessee Gas Pipeline Company L.L.C. (TGP) – Station 71* and to provide practical methods for assuring compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

Acronyms

PSD - Prevention of Significant Deterioration

NESHAP - National Emission Standards for Hazardous Air Pollutants

NSPS - New Source Performance Standards

MACT - Maximum Achievable Control Technology

NSR - New Source Review

GHGs – Greenhouse Gases

I. Identification Information

A. Source Description

Tennessee Gas Pipeline Company L.L.C. (TGP) is an interstate natural gas pipeline company. TGP owns and operates Station 71 in Middleton, TN in Hardeman County. This is a compressor station for transporting natural gas through the transmission pipeline system. The station has:

01 - Twenty-three (23) 2-cycle (stroke) lean-burn reciprocating natural gas-fired internal combustion engines for compression of pipeline natural gas

02 - One (1) 4-cycle (stroke) lean-burn reciprocating natural gas-fired emergency engine serving a generator

03 – One (1) natural gas-fired jacket water heater and one (1) natural gas-fired waste water evaporator

B. Facility Classification

1. Attainment or Non-Attainment Area Location

Area is designated as an attainment area for all criteria pollutants.

2. Company is located in a Class II area. (this means that the facility is not located within a national park or national wilderness area; see 40 CFR 52.21 (e) for complete definition)

C. Regulatory Status

1. PSD/NSR

This facility is a major source above the PSD threshold of 250 tpy based on PTE for NO_x and CO at 5,632.86 and 1,414.20 tons/yr respectively.

2. Title V Major Source Status by Pollutant

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's status?	
		Major Source Status	Non-Major Source Status
PM	Yes	No	
PM ₁₀	Yes	N/A	
SO ₂	Yes	No	
VOC	Yes	Yes	
NO _x	Yes	Yes	
CO	Yes	Yes	
Individual HAP	Yes	Yes	
Total HAPs	Yes	Yes	
CO ₂ (e)	Yes	Yes	

3. MACT Standards

This facility is a major source for HAPS.

40 CFR 63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) Pursuant to **§63.6590(b)(3)(i)** the Permittee's twenty three (23) existing spark ignition (SI) 2 stroke lean burn (2SLB) stationary RICE with a site rating of more than 500 brake HP each are not subject to any of the requirements of this subpart and of subpart A of this part, including initial notification requirements for these engines. Emergency generator engines with a site rating of more than 500 hp located at a major HAP source do not need to comply with emission limitations in Table 1a, 2a, 2c, and 2d to subpart ZZZZ or operating limitations in Table 1b and 2b to this subpart; however an initial notification must be submitted within 120 days from the engine startup.

4. Program Applicability

Are the following programs applicable to the facility?

PSD (*Yes*)

NESHAP (*Yes*)

NSPS (*Yes*)

II. Compliance Information

A. Compliance Status

Is the facility currently in compliance with all applicable requirements? *Yes*

Are there any applicable requirements that will become effective during the permit term? *No*

III. Other Requirements

A. Emissions Trading

The facility is not involved in an emission trading program.

B. Acid Rain Requirements

This facility is not subject to any requirements in Title IV of the Clean Air Act.

C. Prevention of Accidental Releases

Not applicable

D. Greenhouse Gas (GHG) Emissions

This facility is a major source of greenhouse gas emissions with a potential-to-emit of approximately 204,221 tons per year of carbon dioxide equivalent tonnage.

IV. Public Participation Procedures

Notification of this draft permit was mailed to the following environmental agencies:

1. EPA Region IV
2. Mississippi Dept. of Environmental Quality, Office of Pollution Control
3. Shelby County, Environmental Health Services Metropolitan Health Dept.

V. Permit History

Title V Operating Permit No. 572606 represents the third renewal of the original Title V Permit No. 546589 issued February 9, 1998. The first renewal permit no. 555662 was issued June 25, 2004. The second renewal permit no. 562546 was issued September 17, 2012

- Title V Renewal Application dated March 9, 2017 by Tennessee Gas Pipeline Company, LLC (TGP) was received by the Division on March 9, 2017. No changes have been requested.

VI. Public Participation Important Dates:

EPA concurrent review requested	_____
Public Notice publication date	_____
Public Notice period completion date	_____
Public Notice publication comments	_____
EPA Notification date	_____
EPA review period completion date	_____
EPA review comments	_____

VII. Current Total Annual Emissions (Potential) (ton/yr)

Pollutant	PM	SO2	CO	VOC	NOx	HAPs	CO₂(e) GHG
Source (35-0006)							
01	82.89	1.01	1,405.94	205.89	5,627.42	136.46	200,912
02	0.05	Neg	6.37	1.59	3.18	0.38	616
03	0.17	0.01	1.89	0.12	2.25	Neg	2,960
Plant-wide							
Total	83.11	1.03	1,414.20	207.61	5,632.86	136.89	204,221